



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 8, 2014

By ECF

Hon. Katherine B. Forrest
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Ross William Ulbricht*, 14 Cr. 68 (KBF)

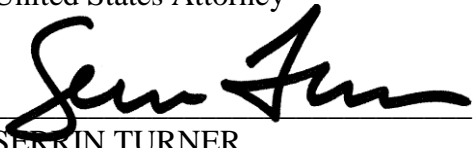
Dear Judge Forrest:

Given defense counsel's representation that the defendant would proffer a declaration attesting to his expectation of privacy in his laptop, email, and Facebook accounts if the Court so required, and given that the declaration would likely be uncontested by the Government since Ulbricht's expectation of privacy in these items seems clear, the Government is willing to stipulate, in the interest of efficiently resolving the defendant's motion, that the defendant has standing to move to suppress these items. However, for the reasons set forth in the Government's memorandum in opposition, the motion is meritless.

Respectfully,

PREET BHARARA
United States Attorney

By: _____


SERIN TURNER
TIMOTHY HOWARD
Assistant United States Attorneys
Southern District of New York

cc: Joshua Dratel, Esq.